

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.

In re:

The Application of Madeleine Habib, Tomas
Habib, and Agustina Habib, for an Order to
Take Discovery Pursuant to 28 U.S.C. §
1782

**PROPOSED ORDER GRANTING *EX PARTE* APPLICATION
FOR DISCOVERY PURSUANT TO 28 U.S.C. § 1782**

This matter comes before the Court by an *ex parte* application for discovery pursuant to 28 U.S.C. § 1782 by Applicants Madeleine Habib, Tomas Habib, and Agustina Habib. Having reviewed the Application, its supporting Memorandum of Law, and the Declaration of Agustin Pablo Jorge, the Court is satisfied that the requested discovery is warranted pursuant to 28 U.S.C.

Accordingly, it is hereby ORDERED and ADJUDGED that:

1. M. Paula Aguila, Esq., counsel for Madeleine Habib, Tomas Habib, and Agustina Habib, is authorized to issue and serve subpoenas upon: UBS AG, J.P. Morgan Chase & Co., BankFlorida, Bank of America, Julius Baer Group, Zurcher Kantonalbank, Morgan Stanley Investment Banking, Morgan Stanley Wealth Management and the Royal Bank of Canada (collectively, the “Financial Institutions”), related to any accounts, individual or joint, under the names of Hector Hugo Habib (“H. Habib” or the “Deceased”), Gustavo Carlos Habib (“G. Habib”), or Marta Carolina Habib (“M. Habib” or, collectively with G. Habib, the “Fraudsters”), and upon any other financial institution within the jurisdiction of this Court, into which funds were transferred from the Financial Institutions, including documents related to those transfers (collectively, the “Habib Accounts”).



2. A copy of this Order shall be served with each discovery demand; and
3. The Court shall retain jurisdiction over this matter for the purpose of enforcing this Order, as appropriate, and assessing any supplemental request for discovery assistance by the Applicants.

DONE and ORDERED in chambers at Miami, Florida, this ____ day of September, 2024.

United States District/ Magistrate Judge